

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13
CRYSTAL PURIEFOY-DAVIS :
Debtor : No. 20-12657-MDC

ANSWER TO MOTION OF SPECIALIZED LOAN SERVICING
AND CERTIFICATE OF SERVICE

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted only that payments were late. Debtor has paid the mortgage up to date up to November. The motion should be denied.
8. Denied
9. Denied.
10. No response required.

WHEREFORE Debt respectfully requests this Honorable Court deny Movant's Motion for Relief

/s/ David M. Offen
David M. Offen
Attorney for Debtor

Dated: 11/27/2020

A copy of this Answer is being served on Rebecca Solarz, Esquire, and the Chapter 13 Trustee.

/s/ David M. Offen
David M. Offen
Attorney for Debtor